

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DARLINGTON AMADASU,
Plaintiff,

Case No. 1:01-cv-210

v.

Judge Dlott
Magistrate Judge Black
PLAINTIFF'S ANSWER TO
TEXAS DEFENDANTS' FIRST
REQUEST FOR ADMISSION

JAMES R. DONOVAN, M.D. *et al.*,
Defendants.

PLAINTIFF'S ANSWER TO
DEFENDANTS' FIRST SET OF REQUESTS FOR ADMISSION
TO THE PLAINTIFF

FROM: Mr. Darlington Amadasu, Plaintiff Pro Se, P.O. Box 6263, Cincinnati, OH 45206.

TO: Texas Defendants Claudia Miller, Roger Perales, and The University of Texas
- San Antonio Health Science Center ("UTHSCSA") and respectfully answers their First Set of
Requests for Admission to Plaintiff Darlington Amadasu pursuant to Federal Rules of Civil
Procedure 26 and 34.

REQUEST FOR ADMISSION NO. 1:

Admit that you submitted an application for participation in the STEER program in Laredo
Texas.

ANSWER: Objection for vagueness of the word 'Participation' Denied
Plaintiff states that he submitted application for training in STEER
program at Laredo, Texas for guaranteed four (4) weeks.

REQUEST FOR ADMISSION NO. 2:

Admit that you did not submit an application for employment with UTHSCSA.

*Defendants' First Set of Requests
for Admissions Plaintiff Amadasu
December 10, 2004
Page 1 of 34*



ANSWER: Plaintiff has no knowledge or information sufficient to admit or deny the request.

REQUEST FOR ADMISSION NO. 8:

Admit that you were not an employee of UTHSCSA.

ANSWER: Plaintiff admits but states that he was a physician trainee of UTHSCSA.

REQUEST FOR ADMISSION NO.9:

Admit that you were not an employee of Claudia Miller.

ANSWER: Plaintiff admits but states that he was a physician trainee of Claudia Miller

REQUEST FOR ADMISSION NO. 10:

Admit that you were not an employee of Roger Perales.

ANSWER: Plaintiff admits

REQUEST FOR ADMISSION NO. 11:

Admit that you have never been enrolled as a student at UTHSCSA.

ANSWER: Plaintiff admits but states that he was enrolled as a medical resident/physician trainee at UTHSCSA

REQUEST FOR ADMISSION NO. 12:

Admit that you were discharged from the Steer Program for improper conduct.

ANSWER: Plaintiff absolutely denies this request but states that he was defamed and discharged from STEER for discrimination/retaliation
Defendants' First Set of Requests and other impermissible reasons.
for Admissions Plaintiff Amadasu

December 10, 2004

Page 3 of 14